

Back in state court, 19SL-CC02229-01, Plaintiff filed various pleadings, including a First Amended Petition, the upshot of which is that a prior Defendant was dismissed and Hallmark Aviation Services, L.P. was added as a Defendant. Hallmark was properly served.

Hallmark, the new Defendant, has now filed for a second removal of this case. Hallmark has not submitted additional “supporting authority or evidence” regarding the amount in controversy.

Under E.D.Mo. L.R. 7-401(B) Plaintiff’s Memorandum in Opposition to Hallmark’s Motion to Dismiss and to Strike is due within seven days of Hallmark’s March 20, 2020 filing, that is, this coming Friday, March 27, 2020.

Due to the pandemic situation and other factors, including co-counsel, Thatcher Stone’s extensive self-quarantine due to a heart condition, and because Plaintiffs anticipate that this court may again conclude that there is insufficient supporting authority or evidence of the amount in controversy, unless some is submitted, and Plaintiff does not want to waste time if the case will again be remanded, Plaintiffs seek an extra three weeks to file their opposition to this Defendant’s Motion to Dismiss and to Strike, that is, to Friday, April 17, 2020.

WHEREFORE, Plaintiffs move for an extension of time to Friday, April 17, 2020 to file their Opposition to Defendant Hallmark Aviation Service, L.P.’s Motion to Dismiss and Strike.

Respectfully Submitted,

/s/ W. Bevis Schock .  
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#### CERTIFICATE OF SERVICE

The undersigned certifies that on March 23, 2020 he served this document on:  
All counsel of record

/s/ W. Bevis Schock .  
The service method was: electronic filing on David Berwin and Michael Reda, and e-mail on *pro hac vice* counsel, Tara Shelke and Brian T. Maye.